

Highpointers Foundation Whistleblower Policy

The Highpointers Foundation Code of Conduct (hereinafter referred to as the Code) requires directors and other volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objectives of the Highpointers Foundation Whistleblower Policy are to establish policies and procedure for:

- the submission of concerns regarding questionable accounting or audit matters by directors, officers, and other stakeholders of the organization, on a confidential and anonymous basis;
- the receipt, retention, and treatment of complaints received by the organization regarding accounting, internal controls, or auditing matters;
- the protection of directors and volunteers reporting concerns from retaliatory actions.

Reporting Responsibility

Each director and volunteer of the Highpointers Foundation has an obligation to report in accordance with this Whistleblower Policy (a) questionable or improper accounting or auditing matters, and (b) violations and suspected violations of the Highpointers Foundations's Code (hereinafter collectively referred to as Concerns).

Authority of Audit Committee

All reported Concerns will be forwarded to the Audit Committee in accordance with the procedures set forth herein. The Audit Committee shall be responsible for investigating and making appropriate recommendations to the Board of Directors, with respect to all reported Concerns.

No Retaliation

This Whistleblower Policy is intended to encourage and enable directors and volunteers to raise Concerns within the Organization for investigation and appropriate action. With this goal in mind, no director or volunteer who, in good faith, reports a Concern shall be subject to retaliation. Moreover, a volunteer who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including dismissal from the volunteer position.

Reporting Concerns

Directors and other volunteers should submit Concerns in writing directly to the Chair of the Audit Committee. The Audit Committee shall consist of the Compliance Director, the President, the Chief Financial Director, the Vice President and others from time to time. Contact information for the Chair of the Audit Committee may be obtained from the President or Secretary.

Handling of Reported Violations

The Audit Committee shall address all reported Concerns. The Chair of the Audit Committee shall

immediately notify the Audit Committee and the President of any such report. The Chair of the Audit Committee will notify the sender and acknowledge receipt of the Concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted Concerns.

All reports will be promptly investigated by the Audit Committee, and appropriate corrective action will be recommended to the Board of Directors, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the Concern.

The Audit Committee has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

Acting in Good Faith

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or a violation of the Codes. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position. Such conduct may also give rise to other actions, including civil lawsuits.

Confidentiality

Reports of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position. Such conduct may also give rise to other actions, including civil lawsuits.

Reporting an Incident

Any person, a Highpointers Foundation member or otherwise, may report any audit/accountability concern to the Foundation President, Treasurer, or Secretary via HighpointersFoundation@gmail.com or The Highpointers Foundation, PO Box 2092, Evergreen, CO 80437.